



**DLA Piper LLP (US)**  
500 Eighth Street, NW  
Washington, DC 20004  
www.dlapiper.com

Nancy Victory  
nancy.victory@dlapiper.com  
T 202.799.4216  
F 202.799.5616

April 24, 2019  
*VIA ECFS*

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

**REDACTED – FOR PUBLIC INSPECTION**

**Re: Notification of Written *Ex Parte* Presentation  
Applications of T-Mobile US, Inc. and Sprint Corporation for Consent to Transfer  
Control of Licenses and Authorizations; WT Docket No. 18-197**

Dear Ms. Dortch:

Pursuant to Section 1.1206(b) of the Commission's Rules, 47 C.F.R. § 1.1206(b), notice is hereby provided of a written *ex parte* presentation in the above-referenced docket. By this filing, T-Mobile US, Inc. and Sprint Corporation (collectively, "Applicants") submit the attached errata, marked as Attachment A to this letter, to Tables 2, 4, and 5 from the April 22, 2019 submission by Drs. Mark Israel, Michael Katz, and Bryan Keating (the "April 22 Submission").<sup>1</sup>

These errata correct certain estimates reported in the April 22 Submission. As a result of a coding error, the amounts reported in Table 2 for certain of Sprint's network marginal cost savings were \$0.01 (one cent) per subscriber/month different than the amounts that should have been reported. This error also propagated into Tables 4 and 5 and resulted in total welfare changes that were less than 0.1 percent different than the amounts that should have been reported. The versions of Tables 2, 4, and 5 attached as Appendix A correct this. The one-cent difference in Sprint's network marginal costs and the resulting difference in welfare calculations are immaterial to the underlying economic analysis. The Applicants submit these errata in the

---

<sup>1</sup> Letter from Nancy J. Victory, Counsel to T-Mobile US, Inc., to Marlene Dortch, Secretary, FCC, WT Docket No. 18-197 at Att. B, Mark Israel, Michael Katz and Bryan Keating, *The Conclusion That the Proposed Merger of Sprint and T-Mobile Will Increase Consumer Welfare Holds Even if the Standalone Companies Would Otherwise Obtain Licenses to mmWave Spectrum* (filed Apr. 22, 2019).



Marlene H. Dortch  
April 24, 2019  
Page 2

interest of transparency and to ensure the accuracy of the Commission's record in this proceeding.

This filing contains information designated "Highly Confidential" pursuant to the Protective Order filed in WT Docket No. 18-197.<sup>2</sup> Accordingly, pursuant to the procedures set forth in the Protective Order, a copy of this filing is being provided to the Secretary's Office. In addition, two copies of the Highly Confidential Filing are being delivered to Kathy Harris, Wireless Telecommunications Bureau. A copy of the Redacted Highly Confidential Filing is being filed electronically through the Commission's Electronic Comment Filing System.

Please direct any questions regarding the foregoing to the undersigned.

Respectfully submitted,

**DLA Piper LLP (US)**

*Nancy J. Victory*

Nancy J. Victory

Partner

cc: David Lawrence  
Kathy Harris  
Catherine Matraves  
Linda Ray  
Jim Bird  
David Krech

Attachment

---

<sup>2</sup> *Applications of T-Mobile US, Inc., and Sprint Corporation for Consent to Assign Licenses*, Protective Order, WT Docket No. 18-197 (June 15, 2018).

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT A**

**Table 1**  
**Comparison of Network Marginal Cost Savings Estimates**

Sensitivity Case	T-Mobile						Sprint					
	2019	2020	2021	2022	2023	2024	2019	2020	2021	2022	2023	2024
<u>Network Marginal Cost Savings (\$/Sub/Month)</u>												
Original Treatment of mmWave												
Refined Treatment of mmWave												
BVZ 100/200												
BVZ 200/400												
BVZ 500/1000												
<u>5G Usage (GB/Sub/Month)</u>												
Original Treatment of mmWave												
Refined Treatment of mmWave												
BVZ 100/200												
BVZ 200/400												
BVZ 500/1000												

Notes: Results are for the Maintain Case.

Table 4

Projected Consumer Benefits under Alternative Spectrum-Acquisition Scenarios									
Sensitivity Case	Consumer Surplus Change by Year (\$/Sub/Month)						Total Welfare Change NPV (\$ Billion)		
	2019	2020	2021	2022	2023	2024	Baseline	Intermediate	Conservative
							(2% DR; Ongoing CS at 2024 Level)	(2% DR; 2025-2029 CS at 2024 Level)	(2% DR; No CS Beyond 2024)
<u>ABH Diversion Ratios</u>									
Original Treatment of mmWave									
Refined Treatment of mmWave									
BVZ 100/200									
BVZ 200/400									
BVZ 500/1000									
<u>ABH Nested Logit Diversion Ratios</u>									
Original Treatment of mmWave									
Refined Treatment of mmWave									
BVZ 100/200									
BVZ 200/400									
BVZ 500/1000									
<u>Harris Mobile Insight Based Diversion Ratios</u>									
Original Treatment of mmWave									
Refined Treatment of mmWave									
BVZ 100/200									
BVZ 200/400									
BVZ 500/1000									
<u>Sprint Brand IQ Survey Based Diversion Ratios</u>									
Original Treatment of mmWave									
Refined Treatment of mmWave									
BVZ 100/200									
BVZ 200/400									
BVZ 500/1000									
<u>T-Mobile SoGA and SoDA Estimates Based</u>									
Original Treatment of mmWave									
Refined Treatment of mmWave									
BVZ 100/200									
BVZ 200/400									
BVZ 500/1000									
<u>Subscriber Share Based Diversion Ratios (Si)</u>									
Original Treatment of mmWave									
Refined Treatment of mmWave									
BVZ 100/200									
BVZ 200/400									
BVZ 500/1000									
<u>Adjusted Facebook Data Based Diversion Ratios</u>									
Original Treatment of mmWave									
Refined Treatment of mmWave									
BVZ 100/200									
BVZ 200/400									
BVZ 500/1000									
<u>Conservative Industry Elasticity (-0.1)</u>									
Original Treatment of mmWave									
Refined Treatment of mmWave									
BVZ 100/200									
BVZ 200/400									
BVZ 500/1000									

**Notes:** Results are for the adjusted Nevo model in the Maintain Case using the site-specific scaling approach to calculating LTE throughput. The model assumes -0.3 industry elasticity, 75% wholesale pass-through rate, and vGUPPI without input substitution. It applies near-term retail and wholesale price constraints. A positive number indicates that the merger is procompetitive.

Table 5

**Projected Consumer Benefits under Alternative Spectrum-Acquisition Scenarios:  
Limited-Baseline-Network Sensitivity**

Sensitivity Case	<u>Consumer Surplus Change by Year (\$/Sub/Month)</u>						<u>Total Welfare Change NPV (\$ Billion)</u>		
	2019	2020	2021	2022	2023	2024	Baseline (2% DR; Ongoing CS at 2024 Level)	Intermediate (2% DR; 2025-2029 CS at 2024 Level)	Conservative (2% DR; No CS Beyond 2024)
<u>ABH Diversion Ratios</u>									
Original Treatment of mmWave									
Refined Treatment of mmWave									
Limited-Baseline Network									
Limited-Baseline Network - BVZ 200/400									
<u>ABH Nested Logit Diversion Ratios</u>									
Original Treatment of mmWave									
Refined Treatment of mmWave									
Limited-Baseline Network									
Limited-Baseline Network - BVZ 200/400									
<u>Harris Mobile Insight Based Diversion Ratios</u>									
Original Treatment of mmWave									
Refined Treatment of mmWave									
Limited-Baseline Network									
Limited-Baseline Network - BVZ 200/400									
<u>Sprint Brand IQ Survey Based Diversion Ratios</u>									
Original Treatment of mmWave									
Refined Treatment of mmWave									
Limited-Baseline Network									
Limited-Baseline Network - BVZ 200/400									
<u>T-Mobile SoGA and SoDA Estimates Based Div</u>									
Original Treatment of mmWave									
Refined Treatment of mmWave									
Limited-Baseline Network									
Limited-Baseline Network - BVZ 200/400									
<u>Subscriber Share Based Diversion Ratios (Simp</u>									
Original Treatment of mmWave									
Refined Treatment of mmWave									
Limited-Baseline Network									
Limited-Baseline Network - BVZ 200/400									
<u>Adjusted Facebook Data Based Diversion Ratio</u>									
Original Treatment of mmWave									
Refined Treatment of mmWave									
Limited-Baseline Network									
Limited-Baseline Network - BVZ 200/400									
<u>Conservative Industry Elasticity (-0.1)</u>									
Original Treatment of mmWave									
Refined Treatment of mmWave									
Limited-Baseline Network									
Limited-Baseline Network - BVZ 200/400									

**Notes:** Results are for the adjusted Nevo model in the Maintain Case using the site-specific scaling approach to calculating LTE throughput. The model assumes -0.3 industry elasticity, 75% wholesale pass-through rate, and vGUPPI without input substitution. It applies near-term retail and wholesale price constraints. A positive number indicates that the merger is procompetitive.